

**REMARKS**

Independent claims 1 and 11 have been amended to correct an error in the previously submitted response. The claim language "to generate" has been erroneously deleted from claims 1 and 11 in the previously submitted response.

The Examiner has rejected claims 1 through 29 under 35 U.S.C. §102 as allegedly being obvious over the disclosures in the Herregods et al. reference in view of the Celi et al. reference. In particular, the Examiner has pointed out specific portions of the disclosures for each element of independent claim 1. For the rejections of other independent claims 11 and 21, the Examiner has stated that the same rejection basis is applicable since he asserted that independent claims 11 and 21 are identical to independent claim 1. For the above rejection bases, the Applicant has not amended each of independent claims 1, 11 and 21, but the Applicants would like to further clarify the patentable features of the current invention. The Applicant respectfully requests the Examiner to reconsider the pending rejections in view of the following remarks.

The current invention as claimed in the previously amended independent claims requires the on-the-fly selection of "a selected portion." Previously amended independent claims 1, 11 and 21 each explicitly recite "selecting a portion of the single overlapping image ... while the single overlapping image is being displayed." Namely, the user selects a particular portion to be later processed in the combined overlapping image while the single image is displayed to the user.

Furthermore, previously amended independent claims 1, 11 and 21 each explicitly recite "simultaneously image processing the selected portion ... based upon the selected process while the single overlapping image is being displayed." In other words, the user sees the process being performed on the selected portion while the single combined image is displayed. The selected portion of the combined image data is simultaneously

processed while the user visually confirms the effect of the selected process with the displayed single overlapping image.

In contrast to the above explicitly recited patentable features, the Herregods et al. reference discloses a variable data print technology. In general, the variable data print technology includes a variable data file for storing page specific information and a master data file for storing information on the background and the positional data for the variable data. (See lines 26 through 29, lines 39 through 54 in column 8). After the positions of the variable data are determined by the user, a variable data merger program is invoked to combine the content of the variable data file and the master data file to generate desired outputs. Although the user can specify a number of copies and a paper size in generating outputs, any process to be performed on the specific image data must be predetermined prior to the merger process. In other words, the user of the variable data print technology as disclosed by the Herregods et al. reference cannot see on the display how the process interacts with the selected portion of the single combined image.

For the lack of the above disclosure, the Examiner now has cited the Celi et al. reference. The Celi et al. reference discloses a method, system and program for superimposing data from different application programs. As summarized in the Abstract, when a program receives first input graphics commands from a first application program to display a first output on a display monitor and second input graphics commands from a second application program to display second output on the same display monitor, the second output is graphically blended with an overlapping portion of the first output. The blending of the second output does not affect the input/output operation through the first output or window. In other words, the Celi et al. disclosures are related to blending two images while the first output operation is maintained. There is no disclosure or suggestion on any processing of the second output in the Celi et al. reference.

To reiterate, previously amended independent claims 1, 11 and 21 each explicitly recite “simultaneously image processing the selected portion ... based upon the selected process while the single overlapping image is being displayed.” The selected portion of the combined image data is simultaneously processed while the user visually confirms the effect of the selected process with the displayed single overlapping image as explicitly recited in the claim language, “while the single overlapping image is being displayed” in previously amended independent claims 1, 11 and 21. Although the Celi et al. reference discloses the overlapping display, the Celi et al. reference fails to disclose, teach or suggest that any process is performed on the overlapped image. In fact, the Celi et al. reference teaches away from the above patentable features since the input/output operation is strictly limited to the first output window and the second output simply does not interfere with the first output operation.

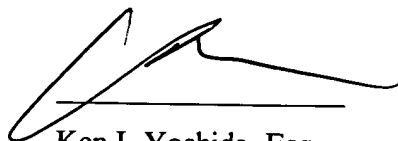
Furthermore, as discussed in the last response, the Herregods et al. reference discloses a variable data print technology whose major purpose is to reduce the memory requirement for the files to be stored by recycling the page specific image data. In sharp contrast to this recycling idea, the current invention as explicitly recited in previously amended claims 1, 11 and 21 is related to a selected portion and simultaneous processing of the selected portion of the combined image data while the user visually confirms the effect of the selected process with the displayed single overlapping image. In sharp contrast, the Celi et al. reference discloses the visual blending of first graphical output and second graphical output while the blended graphical image does not affect the input/output operation of the first graphical output. The Celi et al. reference is motivated by the inconvenience caused by pop-up windows during the input and output user operations via the screen based interface. Because of the major difference in motivation and purpose between the two cited references, it would not have been obvious to one of ordinary skill in the relevant art to combine the Herregods et al. reference and the Celi et al. reference. For the above reason, the Applicant respectfully submits the Examiner that the two cited references are not properly combined for the current 103 rejections.

Based upon the above patentable distinctions and the above stated reasons, the combination of the Herregods et al. reference and the Celi et al. reference fails to make the subject matter in each of the previously amended independent claims obvious. Thus, it would not have been obvious to one of ordinary skill in the art to provide the above quoted patentable feature of previously amended independent claims 1, 11 and 21. Dependent claims 2 through 10, 12 through 20 and 22 through 29 ultimately depend from previously amended independent claim 1, 11 or 21 and incorporate the above patentable features of the current invention. Therefore, the Applicant respectfully submits to the Examiner that the pending rejection of claims 1 through 29 under the section 103 should be withdrawn.

### **Conclusion**

In view of the above amendments and the foregoing remarks, Applicant respectfully submits that all of the pending claims are in condition for allowance and respectfully request a favorable Office Action so indicating.

Respectfully submitted,



Ken I. Yoshida, Esq.  
Reg. No. 37,009

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KNOBLE YOSHIDA & DUNLEAVY LLC  
Eight Penn Center, Suite 1350  
1628 John F. Kennedy Blvd.  
Philadelphia, PA 19103  
(215) 599-0600  
Customer No.: 21,302